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RI Executive Office of Health and Human Services

Comments re: RI Section 1115 Research and Demonstration Waiver Extension Request

Submitted by: Kathleen Kelly, Executive Director, RI Assisted Living Association

Thank you for this opportunity to provide comment on the Executive Office of Health and Human Service request for the extension of the State's 1115 Waiver, informally referred to as the RI Global Medicaid Waiver.

The RI Assisted Living Association has identified a few areas where resources from the extended 1115 waiver could be utilized to support improved outcomes:

There is an increasing need for memory care services for those participant's with advanced Alzheimer's disease. People with memory loss need a significant amount of supervision and redirection in addition to tasks like bathing, dressing. Currently Medicaid services are task oriented not supervisory, as the population ages there will be more participants with memory care issues. Assisted living providers do offer memory care services to the non Medicaid resident there is no funding in Medicaid for the increased supervision necessary; so frequently these people get moved to the "highest" level of care category even though their physical care needs remain the same.

Due to limitations within the Assisted Living statute and regulations, residents in assisted living have high utilization of emergency department services and a high possibility of re-hospitalization for chronic diseases like CHF, diabetes, heart disease and stroke. There is a clear opportunity to develop pilot programs that could manage these issues and in some cases prevent unnecessary ED utilization.

The waiver application mentions "bridge" services but does not describe the concept in detail. There are nursing services that do not rise to the level of skilled nursing services that could be provided in assisted living to chronic and stable residents with some regulatory change. There are temporary health service needs like a healing MOHS surgery scar that could be provided in concert with a home health agency and an assisted living with nurses on staff to residents who are ambulatory and otherwise meet the definition of an assisted living resident.

The waiver application emphasizes the need for affordable housing and recommends a supported housing option. We support this concept and recommend that the state recognize there is also a segment of the targeted population that needs consistent supervision. Assisted Living can be an appropriate setting for this type of client. There is currently a sub set of assisted living providers who accommodate residents do not meet the "high level" because their disability is more behavioral than physical. We strongly suggest that these people receive "assisted living services" in the waiver as "preventative services" for persons who are more vulnerable in the community. The concept should be revisited now that the waiver application asks for relief from the IMD exclusion.

Although the rules clearly prevent the utilization of Medicaid dollars for room and board there needs to be a commitment from the state to identify a stable funding mechanism for these costs in order to achieve the expansion of assisted living services mentioned in the waiver application and to achieve the rebalancing and savings in the system. In recent history there have been significant reductions to SSI for assisted living which have placed providers under tremendous financial pressure. In fact several providers have closed as a result. Providers that accept Medicaid Wavier funds can not continue to be excluded from the any attempt to resolve the room and board funding opportunities. Assisted Living providers that utilized federal tax credit funding to establish their buildings are required by HUD to provide single occupancy apartments. The tax credit system fostered the creation of several assisted living providers that provide services for Money Follows the Person and the Assisted Living Services. Without resolving the room and board issue utilization of assisted living in these programs will be hampered.

Thank you for your consideration, we look forward to being of assistance to move these concepts forward.